

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

RAFAEL MARCHANTE,

Plaintiff,

v.

REUTERS AMERICA LLC, and  
REUTERS NEWS & MEDIA INC.,

Defendants.

Case No. 1:23-cv-08864-DEH

**DECLARATION OF ANNA VALDERRAMA IN FURTHER SUPPORT OF  
DEFENDANTS' MOTION TO DISMISS**

I, Anna Valderrama, hereby declare under penalty of perjury under the laws of the United States as follows:

1. I respectfully submit this declaration on behalf of Defendants Reuters America LLC and Reuters News & Media Inc. ("Defendants") in further support of Defendants' motion to dismiss.
2. I am currently the General Manager for Europe at Reuters and am employed by Reuters News & Media Spain (together with its predecessor entities, "Reuters España"). I previously served as Chief Producer, Visuals, Iberia and, in that role, I oversaw the services performed by Plaintiff Rafael Marchante for Reuters España.
3. The below is based on personal knowledge, interviews with personnel at Reuters, and review of relevant records.
4. I have reviewed the declarations of Plaintiff Rafael Marchante ("Marchante") and Paul Hanna ("Hanna") accompanying Marchante's opposition to Defendants' motion to dismiss



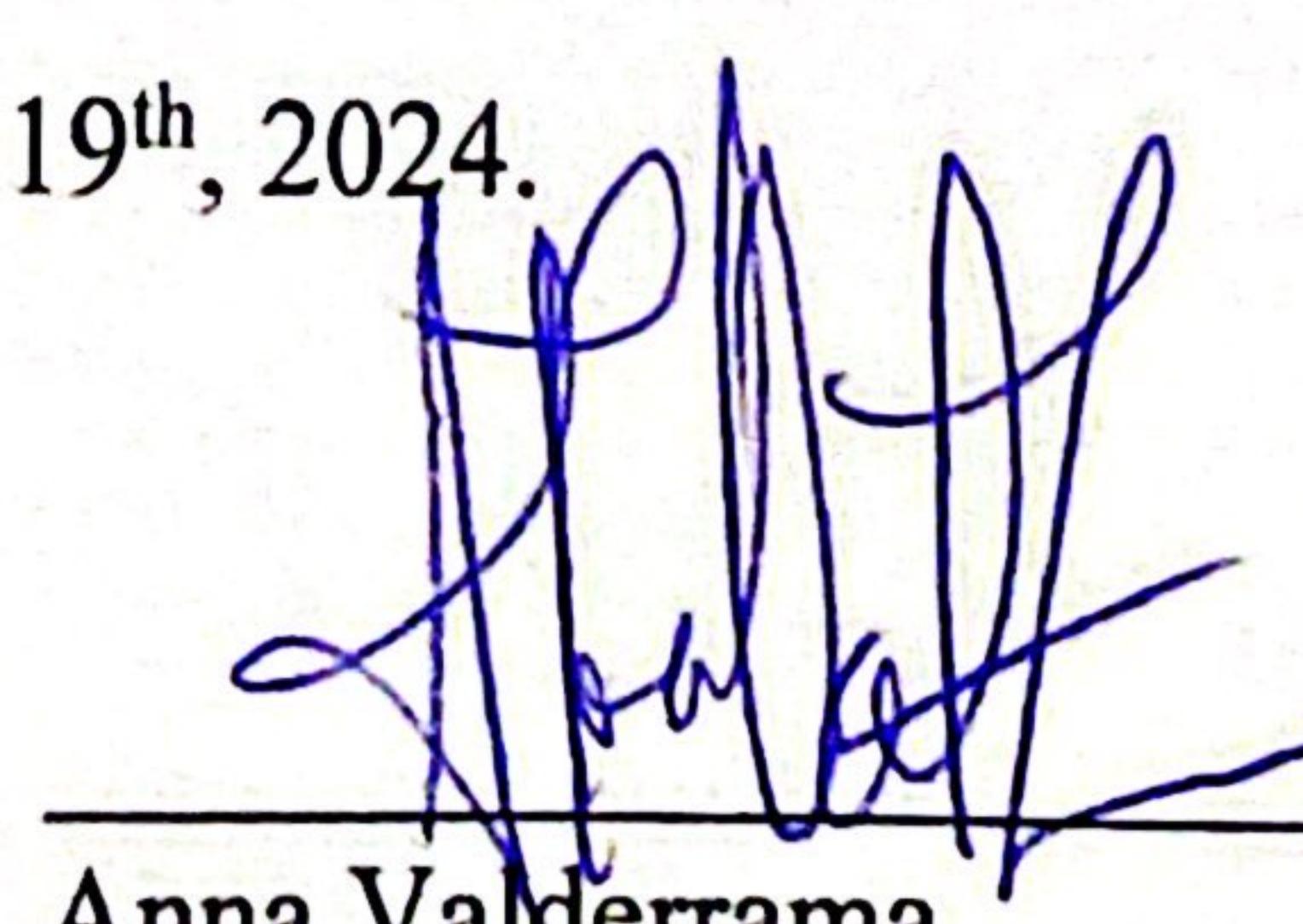
and submit this declaration to correct several factual matters.

5. First, Marchante states that Rickey Rogers was based in New York, but this is incorrect: in his role as Global Editor for Reuters Pictures, Mr. Rogers was based in London from March 2017 through 2021, and from that point, was located in Pittsburgh, Pennsylvania. Mr. Rogers was only based in New York from 2015-16, when he was the Pictures Editor for the Americas.

6. Second, Marchante's point of contact for all day-to-day matters—including, for instance, what news in Spain or Portugal he would cover for Reuters and/or questions about his photographic equipment—was his manager, Paul Hanna, and after Mr. Hanna, me. Both Mr. Hanna and I were based in Spain for the relevant times of Marchante's relationship with Reuters.

7. In addition, if photographers based in Spain or Portugal had questions about royalties, they would typically pose such questions to Mr. Hanna, and then later, to me. Mr. Hanna and I would have received any relevant royalty reports—including any reports concerning Plaintiff—from a Reuters employee named Soraya Kherfi. Ms. Kherfi was based in London from 2015 to 2020. In 2020, Ms. Kherfi moved to Spain and is currently located in Spain. Any dispute that Plaintiff has about royalties, or the receipt of relevant royalty statements, is centered in Spain.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 19<sup>th</sup>, 2024.



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Anna Valderrama